

May 17, 1999

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Janet Allen
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Chatsworth, CA 91311

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket #98N-1038
"Irradiation in the production, processing and handling of food"

Dear FDA:

This letter is in response to your request for public comments regarding the above-named Docket # per the labeling of irradiated foods. I am an educator, a writer, and a nutritional consultant, and as such, I have always emphasized the importance of self-education, freedom of information, and the protection of our rights as American citizens. I have written educational manuals for teachers, articles aimed at parents and children, and a health-oriented column in a newspaper. The main thing that my readers seem to demand is that their hunger for information be satisfied in all areas that pertain to making important decisions about their lives, families, and health. People want to believe that the government will protect their rights to be provided the uncensored facts. In addition, our children's respect for and dedication to this great nation are based upon the individual freedoms afforded us by the legal system, the Constitution, and the Declaration of Independence. I ask your administration to uphold the very thing that we proud Americans have come to associate with the United States: a democratic government that is for, by, and of the people in all regards. What we feed our children, ourselves, and our loved ones is of the ultimate importance, and the right to full disclosure about the true nature of our food and the processes it has undergone is a fundamental privilege that must be protected at all costs.

I feel that prominent labeling of foods treated with this process should be MANDATORY, and that the exact words "irradiated" or "treated with (ionizing) radiation" be prominently and clearly displayed on the front of the package, along with the international radura symbol, so that persons speaking a different language, the illiterate, and young visually-oriented people and children also can be informed. It is important that the labeling be large enough to be easily read and on the front of the food package, because as a consumer I have experienced the frustration of having to spend too much time searching out information about a processed food's ingredients, additives, or processes, only to have to struggle to read its tiny print on the back bottom of the label. If a food is irradiated and that would be a reason for me to buy it, or not to buy it, I hope I would not have to spend a lot of

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time standing in the supermarket aisle just trying to find this piece of information.

I heard about the proposed alternative terms such as "cold or electronic pasteurization", but I do not at all agree that these properly convey the correct information to the consumer. I think it just makes things more confusing and would be misleading...yet another new term for the shopper to figure out. The term "irradiated" is much clearer and truthful, whereas pasteurization is related by most people to be something completely different, applying to dairy products and such. And I also believe that the absence of any statement on irradiated foods would be misleading and take away people's choice as to whether or not to purchase that item. If one feels that certain irradiated foods are desirable, then how would one be able to know which items those are? And if someone else has perhaps tasted a particular irradiated food already, didn't like the new taste or texture that the process created, and has decided to avoid that food the next time, only a clear label will help the individual to do that. Kids are especially picky about the way a food tastes, and parents most definitely will need the label to match their children's tastes to the product, or on the other hand, to buy foods that they feel are the safest and cleanest for their offspring. Otherwise, a lot of money could be wasted buying the wrong products.

The nutritional depletion of irradiated foods may be yet another concern, and if someone is sick or fighting a disease and needs to keep their immune system especially strong at the present, then perhaps they may choose for the time being to purchase the non-irradiated foods. If the food has been irradiated and will constitute a large part of their diet that day, the consumer may opt to take an extra vitamin-mineral tablet to make up for it. (Hopefully, the new nutritional make-up of the food after irradiation will be reflected accurately on the label in the nutrient breakdown column.) I emphasize that the FDA's original reason for the labeling requirements is still valid--that irradiation may change the texture, taste, storage characteristics and nutrients of foods, and this process should be disclosed to avoid misleading the consumer.

These labels (with wording and radura) should always remain a requirement on irradiated foods, not to expire at any specified date in the future, because it is the only definite way of continuing to protect the freedoms and rights of the American (or foreign) consumer. All I ask for is to be able to have the FREEDOM OF CHOICE to decide what I put in my body, and to be given the correct information to make that choice, whether it be ingredients, additives, processes, expiration date of the product, where and who it is manufactured by, etc. Everybody bases their choices on different things, and that needs to be respected and supported by our government agencies by supplying all the proper information on the labels. Therefore, the wording of the current radiation disclosure statement should not be revised or altered.

I heard that the Center for Science in the Public Interest also supports the labeling of irradiated foods, and I highly respect their opinions and the fine reputation they have built in standing up for consumer rights. I understand the following quoted recommendation from them also reflects my viewpoint, so I will repeat it here:

"any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed

in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Thank you for reading my comments. A hard copy of this letter is being mailed to your office as a backup to this electronic submission.

Sincerely,

A handwritten signature in cursive script that reads "Janet Allen". The signature is written in black ink and is positioned above the printed name.

Janet Allen



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2025/08/02

